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10 *Attorneys for Plaintiffs*

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **IN AND FOR THE DISTRICT OF ARIZONA**

11 Johnny Wheatcroft and Anya Chapman, as  
12 husband and wife, and on behalf of minors J.  
13 W. and B. W.,

13 Plaintiffs,

14 v.

15 City of Glendale, a municipal entity; Matt  
16 Schneider, in his official and individual  
17 capacities; Mark Lindsey, in his official and  
18 individual capacities; and Michael Fernandez,  
19 in his official and individual capacities;

18 Defendants.

Case No.: 2:18-cv-02347-SMB

**STIPULATION FOR PLAINTIFFS  
TO FILE THEIR SECOND  
AMENDED COMPLAINT**

20 The Parties, by and through undersigned counsel, hereby stipulate and agree to allow  
21 Plaintiffs to file their Second Amended Complaint, a red-line copy of which is attached hereto.  
22 The Second Amended Complaint adds state-based claims on behalf of the minor Plaintiffs J.W.  
23 and B.W. that arise from the same allegations stated in the prior Complaints. Pursuant to the  
24 Scheduling Order, any amended pleadings are to be filed by March 12, 2019.

25 Defendants stipulate only to Plaintiffs' filing of the Second Amended Complaint, and do  
26 not waive, but rather preserve all of their rights, objections, and defenses, and any right to file

dispositive motions that they may have to the Second Amended Complaint and any and all claims asserted therein.

RESPECTFULLY SUBMITTED this 12<sup>th</sup> day of March, 2019.

ATTORNEYS FOR FREEDOM

By: /s/ Jody L. Broaddus

Jody L. Broaddus, Esq.

Marc J. Victor, Esq.

*Attorneys for Plaintiffs*

JONES, SKELTON & HOCHULI, P.L.C

By: /s/ Joseph J. Popolizio

Joseph J. Popolizio

Justin M. Ackerman

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Phoenix, Arizona 85004

*Attorneys for Defendants*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically transmitted the foregoing to the Clerk's office using the CM/ECF system for filing and transmittal of a Notice of Electronic filing to the following registrants, and a copy was also sent by first class mail to:

Joseph J. Popolizio

Justin M. Ackerman

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Phoenix, Arizona 85004

By: /s/ Alexzandria Thompson